



# **HIPAA – Certificate of Creditable Coverage**

TRICARE Management Activity, Information Management

## **HEALTH INSURANCE PORTABILITY AND ACCOUNTABILITY ACT OF 1996 (HIPAA)**

### ***Overview – Certificate of Creditable Coverage***

The Health Insurance Portability and Accountability Act (HIPAA) of 1996, among other things, sought to improve the portability of healthcare coverage by placing limitations on pre-existing condition exclusions imposed by health plans. Under HIPAA, the Department of Defense (DoD) Military Health System (MHS) is required to issue a Certificate of Creditable Coverage (CoCC) to any MHS beneficiary who loses eligibility for healthcare coverage under TRICARE.

A CoCC is a document that serves as evidence of prior healthcare coverage for the purpose of reducing how much or how long a healthcare plan can exclude someone from coverage for a pre-existing health condition. In general, the certificate identifies the beneficiary (or beneficiaries, if sponsor and family members lose coverage at the same time), and lists the begin and end dates of coverage, or indicates that the beneficiary has had at least 18 months of continuous coverage. Coverage is considered continuous as long as there are no breaks in coverage of 63 days or more.

### ***CoCC Requirements***

Requirements for CoCC are:

- Certificates must be furnished automatically, in writing
- Certificates must be provided in a reasonably prompt fashion
- In general, certificates are provided without a fee
- If an individual loses his/her certificate, he/she may request another, free of charge
- An individual can request a certificate up to 24 months after loss of coverage, because pre-existing condition clauses are generally imposed for a 12-18 month period.



## ***TRICARE Compliance***

The Defense Manpower Data Center Support Office (DSO) is the entity responsible for issuance of CoCC for the MHS. Until recently, the DSO has been issuing "Statements of Service" in lieu of a formal CoCC to beneficiaries, and only upon request.

In early 2002, the HIPAA Program Office formed a CoCC Workgroup, which was composed of representatives from the Services, Reserve Components, Guard Bureaus, Defense Manpower Data Center, and the TRICARE Management Activity Office of General Counsel. This group examined the current process, and determined the beneficiary population entitled to receive a CoCC. The Workgroup then developed the requirements necessary to change the DSO's business processes in order to enable them to begin issuing CoCCs automatically to all beneficiaries who lose TRICARE coverage. Beginning in February 2004, the DSO will initiate the new process and begin automatic issuance of CoCCs to beneficiaries upon loss of TRICARE coverage.

## ***Beneficiary Education***

The CoCC Workgroup has also developed a series of educational materials to be used to inform beneficiaries that they will begin receiving CoCCs automatically when they lose TRICARE coverage. These materials include:

- Fact Sheets
- Briefing slides to be presented to sponsors during outprocessing
- Questions & Answers (Q&As) for beneficiaries
- Q&As and background information for Beneficiary Counseling and Assistance Coordinators (BCACs)
- Information about CoCCs to be inserted in the TRICARE Handbook
- A press release

These materials can be accessed on the web using the following URL:

<http://www.tricare.osd.mil/certificate/index.cfm>

